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Attorneys for Defendants
RYDER INTEGRATEDLOGISTICS, INC.
and HADCO METAL TRADING CO., LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SALNAVE KEEFER, on behalf of himself and all others similarly situated,

Plaintiff,

V.

RYDER INTEGRATED LOGISTICS, INC., a Delaware corporation; HADCO METAL TRADING CO., LLC, a Delaware corporation; and DOES 1 through 50, inclusive.

Defendants.

Case No. 4:21-cv-07503-HSG

**STIPULATION TO CONTINUE
BRIEFING SCHEDULE FOR
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT; ORDER**

Complaint Filed: August 25, 2021
Removal date: September 27, 2021
Trial Date: Not Set.

1 IT IS HEREBY STIPULATED between counsel for Plaintiff SALNAVE
 2 KEEFER (“Plaintiff” or “Keefer”) and counsel for Defendant RYDER INTEGRATED
 3 LOGISTICS, INC. (“Ryder”), and HADCO METAL TRADING CO. LLC (“Hadco”),
 4 (collectively “the Parties”),

5 WHEREAS, following the Parties’ initial case management conference with the
 6 Court, the Court entered an order directing the Parties to meet and confer and e-file a
 7 stipulation and proposed order by January 18 setting a briefing schedule for a motion
 8 for summary judgment limited to the question of whether the disclosure(s) in the
 9 form(s) produced to the individual named plaintiff comply with the relevant statutes
 10 (Dkt. No. 17);

11 WHEREAS, the Parties met and conferred and submitted the following briefing
 12 schedule which was entered by the Court (Dkt. No. 21):

- 13 • **March 7, 2022:** Date for Filing Motion for Summary Judgment.
- 14 • **March 28, 2022:** Date for Opposing Motion for Summary Judgment.
- 15 • **April 4, 2022:** Date for Reply in Support of Motion for Summary Judgment.
- 16 • **May 12, 2022:** Date Proposed for Hearing.

17 WHEREAS, on March 7, 2022, Defendants filed their Motion for Summary
 18 Judgment;

19 WHEREAS, the Parties met and conferred on discovery disputes, and on April
 20 1, 2022 Ryder produced supplemental discovery responses;

21 WHEREAS, Plaintiff also requested to take a limited deposition of a Fed. R.
 22 Civ. Proc. 30(b)(6) witness for Ryder (“PMK”), as well as the deposition of declarant
 23 Ed Tobon offered to support Defendants’ Motion;

24 WHEREAS, the deposition of Ed Tobon took place on April 21, 2022;

25 WHEREAS, the Parties previously stipulated to continue the remaining briefing
 26 schedule as follows (Dkt. No. 28):

- 27 • **April 28, 2022:** Date for Opposing Motion for Summary Judgment.

- **May 5, 2022:** Date for Reply in Support of Motion for Summary Judgment.

WHEREAS, the hearing on Defendants' Motion for Summary Judgment was continued to May 26, 2022 (Dkt. No. 29);

WHEREAS, on April 28, 2022, Plaintiff filed his Opposition to Defendants' Motion for Summary Judgment ("Plaintiff's Opposition");

WHEREAS, given the short amount of time from the filing of Plaintiff's Opposition and given health issues impacting counsel for Defendants' ability to complete the briefing by the current deadline, Defendants require additional time to file their Reply in Support of Defendants' Motion for Summary Judgment;

WHEREAS, the Parties agree to continue the remaining briefing schedule as follows:

- **May 9, 2022:** Date for Reply in Support of Motion for Summary Judgment.

WHEREAS, under the proposed continued schedule the Parties do not believe a continuance of the hearing date would be necessary unless requested by the Court to allow the Court sufficient time to review the briefing before holding the hearing on this matter.

IT IS SO STIPULATED BY,

DATED: May 3, 2022

CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

Kimberly F. Seten
David A. Yudelson
Attorney for Defendants
RYDER INTEGRATEDLOGISTICS, INC.
and HADCO METAL TRADING CO., LLC

1 DATED: May 3, 2022

SETAREH LAW GROUP

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3 /s/ Shaun Setareh (with permission)

4 SHAUN SETAREH

5 WILLIAM M. PAO

6 NOLAN DILTS

7 Attorneys for Plaintiff

8 SALNAVE KEEFER

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ORDER

Pursuant to the above Joint Stipulation and good cause appearing,

IT IS HEREBY ORDERED THAT:

1. Defendants' reply shall be due on or before May 9, 2022.
 2. The hearing date for the motion for summary judgment shall remain as scheduled.

IT IS SO ORDERED.

Dated: 5/4/2022

By. Haywood S. Bell, Jr.

Hon. Judge Haywood S. Gilliam Jr.